

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF INDIANA
HAMMOND DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
THE STATE OF INDIANA, AND)	Civil Action No. 2:07CV262PS
THE CITY OF HAMMOND,)	
)	Judge Phillip P. Simon
Plaintiff-Intervenors,)	
)	
v.)	
)	
JUPITER ALUMINUM CORPORATION,)	
)	
Defendant.)	
)	

**THE UNITED STATES OF AMERICA’S MOTION
FOR ENTRY OF CONSENT DECREE**

By this motion, Plaintiff, the United States of America, on behalf of the United States Environmental Protection Agency (“U.S. EPA”) moves this Court to execute and enter as a final judgment the proposed Consent Decree lodged by the United States on August 10, 2007, following its August 9, 2007 filing of a Complaint against Jupiter Aluminum Corporation (“Jupiter Aluminum”) concerning its Hammond, Indiana facility. If entered, the proposed Consent Decree would resolve all Clean Air Act claims alleged in this action by the United States, Intervenor-Plaintiff the State of Indiana, and Intervenor-Plaintiff the City of Hammond against Jupiter in their respective complaints.

All parties to this action, including Jupiter Aluminum, support entry of the Consent Decree. For the reasons stated in the accompanying memorandum in support of this motion, the Court should grant this motion, execute the original Consent Decree that

has been lodged with the Court, and direct the Clerk to file the Consent Decree and to enter it as the final judgment in this action.

Respectfully submitted,

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/s/ Lisa A. Cherup
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CERTIFICATE OF SERVICE

I hereby certify that on October 10, 2007, I caused to be electronically filed the *United States' Motion for Entry of Consent Decree* and the *United States' Memorandum of Law in Support of Motion for Entry of Consent Decree*, and accompanying Attachments 1-3 with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following listed counsel for Jupiter Aluminum. I also emailed the remaining individuals, the above-mentioned documents, in PDF format:

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